NEW MEXICO
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Certified Mail – Return Receipt Requested

October 15, 2019

Mitch Knapton, General Manager/Chief Engineer
Peabody Natural Resources Company dba Lee Ranch Coal Company
Lee Ranch Coal Mine
P.O. Box 757
Grants, New Mexico 87020

Re: Lee Ranch Coal Mine; Multi-Sector General Permit (MSGP); SIC 1221; NPDES Compliance Evaluation Inspection; NMR053371; September 9, 2019

Dear Mr. Knapton:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6 Water Enforcement Branch (6ECDWR)
1201 Elm Street, Suite 500
Dallas, Texas 75202

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Curry Jones (jones.curry@epa.gov) is the USEPA Region 6's Stormwater Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Erin Shea at 505-827-0418 or at erin.shea@state.nm.us.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6ECDWM) by e-mail
Nancy Williams, USEPA (6ECDWA) by e-mail
Amy Andrews, USEPA (6ECDWM) by e-mail
David Esparza, USEPA (6ECDWM) by e-mail
Curry Jones, USEPA (6ECDWR) by e-mail
Darlene Whitten-Hill, USEPA (6ECDWA) by e-mail
John Roderick, NMED District I by e-mail
James R. Smith, P.E., Program Manager, Coal Mine Reclamation, MMD, EMNRD by e-mail
Chad Gaines, Peabody Natural Resources Company by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
N	NMR0533711	190909	~	S	2

Remarks: SUB-BITUMINOUS COAL MINE

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
	3	N	N	

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Lee Ranch Mine, Lee Ranch Coal Company, A Division of Peabody Natural Resources Company north of Milan, New Mexico. From I-40, take Exit 79 in Milan, travel north at stop sign, turn left onto Old Hwy 66, turn right onto NM 605, cross railroad tracks, travel 14 miles pass NM 509, travel 8 miles toward San Mateo, follow road as it curves left, at Forest Access Road 4761 fork continue left (follow signs) on private road to Lee Ranch Mine office. McKinley County

Entry Time /Date: 1040 hours / 09/09/2019

Exit Time/Date: 1530 hours / 09/09/2019

Permit Effective Date: June 4, 2015

Permit Expiration Date: June 4, 2020 midnight

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

-Chad Gaines, Environmental Specialist, Peabody Natural Resources Company / 505-285-3076
-Myron Newman, Environmental Technician III, Peabody Natural Resources Company

Other Facility Data

Lee Ranch Mine Entrance
Latitude 35.483740°,
Longitude -107.663413°

SIC 1221
Sub-Bituminous Coal Mine

Name, Address of Responsible Official/Title/Phone and Fax Number

Mitch Knapton, General Manager/Chief Engineer; Peabody Natural Resources Company dba Lee Ranch Coal Company; Lee Ranch Coal Mine; P.O. Box 757; Grants, New Mexico 87020 / 505-285-2800

Contacted: Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **SEE ATTACHED WORKSHEET / CHECKLIST REPORT.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin Shea ***/s/Erin Shea*** ***(f/k/a Erin S. Trujillo)***	**NMED/SWQB/505-827-0418**	**10/09/2019**
Signature of Management QA Reviewer	**Agency/Office/Telephone/Fax**	**Date**
Jennifer Foote ***/s/Jennifer Foote***	**NMED/SWQB/505-827-2795**	**10/10/2019**

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation Inspection	Inspector Name	Erin Shea
NPDES ID Number	NMR053371	Telephone	505-827-0418
Inspection Date	09/09/2019	Entry Time	1040 hours
Inspector Type *(circle one)*	EPA [State] EPA Oversight	Exit Time	1530 hours
Facility Sector/ SIC/Activity Code	Sector H Coal Mine / SIC 1221	Signature	*/s/Erin Shea*

Facility Location Information				
Name/Location/ Mailing Address	Lee Ranch Coal Mine, Lee Ranch Coal Mine, A Division of Peabody Natural Resources Company, P.O. Box 757; Grants, New Mexico 87020			
GPS Coordinates	Latitude	35.483740° (Entrance) 35° 29' 04" (SWPPP)	Longitude	-107.663413° (Entrance) 107° 39' 56" (SWPPP)
Receiving Water(s)	Arroyo Tinaja, Mulatto Canyon Drainage listed segments in 20.6.4.97 NMAC, thence to Arroyo Chico, thence to East Rio Puerco, thence to the Rio Grande in 20.6.4.105 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Peabody Natural Resources Company dba Lee Ranch Coal Company / Operator	505-285-2800
Facility Contact	Chad Gaines, Environmental Specialist, Peabody Natural Resources Company	505-285-3076
Authorized Official(s)	Mitch Knapton, General Manager/Chief Engineer	505-285-2800

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	[Y]	N	SWPPP Prepared & Available	[Y]	N
Permit Type	[General]	Individual	SWPPP Contents Satisfactory	Y	[N]
Operational Date	1984		SWPPP Implementation Satisfactory	[Y]	N
NOI/Application Date	02/29/2016		SWPPP Date	01/21/2017	
If applicable, is no exposure certification on file?	N/A		*Intentionally left blank*		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	[Y]	N	SWPPP 08/21/2015 revised 01/21/2017
Copy of the NOI and acknowledgment letter from EPA?	[Y]	N	
Copy of the permit language?	[Y]	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	[N]	N = Not documented (see operator signature/certification below)
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: • Routine facility inspection (3.1.1) • Quarterly visual assessment (3.2.3) • Benchmark monitoring (6.2.1.3).	Y	N	Not Applicable
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	[Y]	N	Updated SPCC date 01/17/2019
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	[Y]	N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	[Y]	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	Not Applicable
Did all “operators” sign/certify the SWPPP?	Y	[N]	N = Not Documented / Provided electronic copy of SWPPP was not signed/certified. See Part 5.4 (SWPPP Availability) of the 2015 MSGP.
Is the storm water pollution prevention team identified (name or title)?	[Y]	N	
Are the storm water pollution prevention team’s responsibilities identified?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	Y	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	Y	N	
Is there a site specific site map?	Y	N	Map shows coal shipping via railroad; coal shipping via conveyor belt; and transport of materials along haul roads areas associated with MSGP.
Does the site map contain the size of the property in acres?	Y	N	Total acreage (16,038 acres) exposed to stormwater provided in SWPPP; but not on Map. Acreage of individual drainage areas provided on Map.
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	N	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	N	
Does the site map contain locations of all existing structural control measures?	Y	N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	N	No Impairments / No Total Maximum Daily Load (TMDLs)
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.2.2?	Y	N	
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	Y	N	Not Applicable / None identified in SWPPP
Does the site map contain locations of all storm water monitoring points?	Y	N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	Not Applicable
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	Map also shows outfalls associated with NPDES Individual Permit No. NM0029581.
Does the site map contain locations of the following activities where these	Y	N	Y = As Applicable

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
activities are exposed to precipitation? • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery			
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	Map also includes areas associated with NPDES Individual Permit No. NM0029581.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	N	As Applicable / SWPPP also includes areas or controls associated with NPDES Individual Permit No. NM0029581.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	Y	N	See notes above.
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	N	TSS, Total Iron, Total Aluminum
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	SWPPP states *"There have been no significant spills or leaks in the past 3 years of oil or toxic or hazardous pollutant at the LRM, including areas or outfalls covered by this SWPPP."*

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination.	Y	[N]	N = Not updated. SWPPP includes information on evaluations conducted 12/12/2008 and 12/10/2009 and that non-stormwater discharges at facility have not changed since last inspections (December 12, 2008). See Part 5.2.3.4 (Unauthorized Non-Stormwater Discharges) of the 2015 MSGP.
Does salt storage occur at this facility?	Y	[N]	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	[Y]	N	

Controls to Reduce Pollutants			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	[Y]	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	[Y]	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	[Y]	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	Y	N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	N	Comment: Additional information on reporting to NMED is available at https://www.env.nm.gov/general/report-an-environmental-issue-or-incident/.

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	No salt storage described in SWPPP / None observed / Not Applicable
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	N	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	

Notes on SWPPP Review (Part 5)

Site Description / Further Explanations / Introduction

On September 9, 2019, Erin Shea of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted an industrial stormwater National Pollutant Discharge Elimination System (NPDES) Compliance Evaluation Inspection (CEI) on the behalf of the United States Environmental Protection Agency (USEPA) at the Lee Ranch Coal Mine approximately 35 miles north-northeast of Milan in McKinley County, New Mexico.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspector, and records and reports kept by the Permittee and/or NMED.

The inspector arrived at the mine at approximately 1040 hours on the day of this inspection. Ms. Shea made introductions, presented credentials and explained the purpose of the inspection to Chad Gaines, Environmental Specialist and Myron Newman, Environmental Technician III, Peabody Natural Resources Company dba Lee Ranch Coal Company. Ms. Shea, Mr. Gaines and Mr. Newman toured the mine. An exit interview to discuss preliminary findings was conducted with Mr. Gaines on site. The inspector left the facility at approximately 1530 hours on the day of this inspection.

The facility is also regulated under the federal Clean Water Act, Section 402, NPDES Individual Permit Number NM0029581 which authorizes discharge of mine drainage from process plant areas; active mining areas; and reclamation areas, brushing and grubbing areas, topsoil stockpiling areas, and regraded areas. The coal mine is active, but coal removal activities were not occurring during this inspection. Contractors conducting reclamation activities were on site. No areas have received State of New Mexico Mining and Minerals Division (MMD) Phase III bond release according to the Permittee Representative. The facility includes a gravel pit which is associated with the MMD coal mine permit and NPDES Individual Permit No. NM0029581.

Part 1.2.1.3 (Deadlines for Submitting NOI)

The Notice of Intent (NOI) submission deadline in Table 1-2 of the 2015 MSGP for operators of industrial activities that were authorized for coverage under the 2008 Multi-Sector General Permit (MSGP) was *"No later than September 2, 2015."* EPA electronic databases indicate that the operator's NOI was submitted February 29, 2016.

Part 8 Sector H Coal Mine of the 2015 MSGP Requirements

Part 8.H.6.4 Dust Control

The provided Stormwater Pollution Prevention Plan (SWPPP) includes discussion on dust controls and that dust control is also regulated by air quality and mining permit. The SWPPP did not include specific air quality permit requirements and how achieved compliance. Part 8.H.6.4 of the 2015 MSGP states *"If you are in compliance with dust control requirements under state or county air quality permits, you must include (or summarize, as necessary) what the state or county air quality permit dust control requirements are and how you've achieved compliance with them."*

NPDES Industrial Storm Water Checklist (MSGP)

Inspections / Visual Assessment (Part 4)			
General			**Notes:**
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	
Are inspections documented, including: • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed.	Y	N	
Exceptions, including (see 3.1.1): • Inactive and unstaffed sites	Y	N	Not Applicable
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	Y	N	N = No Quarterly Visual Samples collected for rain events before or after environmental staff normal business hours described as between 6 am and 2 pm by Permittee Representative. Y = 09/27/2017 Outfall 3b
Does the assessment consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container.	Y	N	Y = 09/27/2017 Outfall 3b

NPDES Industrial Storm Water Checklist (MSGP)

Are assessments documented, including: • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes.	Y	N	
Exceptions, including (see 3.2.3): • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.2.5.3) • Inactive and unstaffed sites.	Y	N	Not Applicable

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6) / Reporting (Part 7)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	N = Written procedures in provided SWPPP may not be sufficient to ensure permit requirements are met (see notes below).
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	Not Applicable
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	Not Applicable
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	Not applicable / no samples collected. See notes above on written procedures.
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling.	Y	N	No benchmark monitoring samples collected for rain events before or after environmental staff normal business hours described as between 6 am and 2 pm by Permittee Representative.
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No benchmark monitoring / See notes above.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	No benchmark monitoring / See notes above.
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	Y	N	No benchmark monitoring / See notes above.

NPDES Industrial Storm Water Checklist (MSGP)

Exceptions, including (see 6.1.5, 6.1.6 & 6.2.1.3): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	No benchmark monitoring / See notes above / Not Applicable
Effluent Limitations Monitoring (Sector A, C, D, E, J, K, L, O, S)			
Sampled once per year?	Y	N	Not Applicable
Follow-up requirements if discharge exceeds effluent limit (see 6.2.2.3)?	Y	N	Not Applicable
Water Quality Based Effluent Limitations			Notes: Not Applicable
Does the facility discharge to water quality impaired waters?	Y	N	
If TMDL exists, does the facility need to monitor?	Y	N	Not TMDL / Not Applicable
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	Y	N	Not Applicable
Does the facility discharge to a CERCLA site?	Y	N	
Additional monitoring required by EPA?	Y	N	

Additional Notes on Monitoring

Part 3.2 Quarterly Visual Assessment of Stormwater Discharges

Part 3.2.1 of the 2015 MSGP states *"If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and you must document why it was not possible to take the sample within the first 30 minutes."*

No Quarterly Visual Assessment samples were collected for rain events outside staff normal business hours described as between 6 am and 2 pm by Permittee Representative, except for one event during business hours on 09/27/2017 (Outfall 3b).

EPA Guidance on monitoring, including use of automatic samplers, if appropriate, is available at https://www.epa.gov/sites/production/files/2015-11/documents/msgp_monitoring_guide.pdf.

Part 8.H.8 Benchmark Monitoring

Part 8.H.8 Sector-Specific Benchmarks (See also Part 6 and Part 9) requires monitoring for Total Aluminum, Total Iron and Total Suspended Solids (TSS) with benchmark monitoring concentrations. Part 9.6.2.1 of the 2015 MSGP (Conditions Applicable to Specific States) includes additional benchmark conditions and modifications.

Provided SWPPP did not include procedures for required methods, containers, preservation, and holding times. Part 6.2.1.1 of the 2015 MSGP states "Samples must be analyzed consistent with 40 CFR Part 136 analytical methods…." Table II Required Containers, Preservation Techniques, and Holding Times in 40 CFR 136.3 requires among other things, preservation using HNO3 to pH <2, or at least 24 hours prior to analysis for Aluminum and Iron; and TSS requires cooling preservation (Cool, ≤6 °C).

EPA guidance on monitoring, including use of automatic samplers, if appropriate, is available at https://www.epa.gov/sites/production/files/2015-11/documents/msgp_monitoring_guide.pdf.

Reporting (Part 7)			
Information must be submitted using NeT for NOI, NEC, NOT and Annual Report.			
General			**Notes:**
Is facility a new discharger or new source to water quality impaired waters? Has the facility submitted this information to EPA Region 6?	Y	N	Not Applicable
If there was a facility exceedance under numeric effluent limitations, was a report submitted to EPA within 30 days?	Y	N	Not Applicable
Did the facility submit benchmark or ELG monitoring through NetDMR?	Y	N	Permittee Representative provided documentation of attempts to resolve electronic reporting of Discharge Monitoring Reports (DMRs) with EPA Region 6. As of writing this report, EPA electronic database indicate that DMRs have been submitted under the permit tracking number NMR053371. It was noted that EPA database for DMRs indicate another Peabody facility name "El Segundo Coal Company" and a permit expiration date of "6/3/20" for the tracking number NMR053371. Submitted DMRs indicate "NODI=C" or "No Discharge." Part 6.1.7 of the 2015 MSGP states "…you must report using a "no data" or "NODI" code for any 3-month interval that you did not take a sample." For questions about electronic reporting, contacts are provided from EPA's web site at https://www.epa.gov/npdes/stormwater-discharges-industrial-activities.
Did the facility submit Annual Reports to EPA through NeT? (Due January 30 of each year)	Y	N	N= Not Documented for 2018. EPA's database shows Annual Reports submitted and received 01/20/2017 (2016) and 01/17/2018 (2017). For questions about electronic reporting, contacts are provided from EPA's web site at https://www.epa.gov/npdes/stormwater-discharges-industrial-activities.
If follow up monitoring per 6.2.2.3 exceeds a numeric limit, did the facility submit an Exceedance Report (paper) to EPA Region 6 in addition to reporting the monitoring data through NetDMR?	Y	N	Not applicable

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	*(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system*) Structural controls include diversions. Facility's railroad loop / overhead conveyor beltline was not operating on the day of this inspection.
Good Housekeeping	*(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)* No roll-off containers kept within areas covered by the 2015 MSGP. No windblown trash was observed during site tour. Facility has equipment or material (mostly metal / scrap metal) storage in areas associated with NPDES Individual Permit No. NM0029581.
Preventative maintenance	*(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)* Maintenance of vehicles described in SWPPP to be in areas associated with NPDES Individual Permit No. NM0029581. Facility's railroad loop / overhead conveyor beltline was not operating on the day of this inspection. No need for preventative maintenance activities observed in areas covered by the 2015 MSGP during site tour.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	*(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)* No spills observed in areas covered by the 2015 MSGP during site tour.
Erosion and Sediment Controls	*(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)* Active haul roads are not stabilized. Structural controls include paved areas and ponds associated with NPDES Individual Permit No. NM0029581. Erosional features / evidence of runoff was observed at haul road low water crossing below railroad loop and overhead conveyor beltline at Mulatto Canyon Drainage Diversion. Dissipation devices (riprap) exists at crossing.
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* Mulatto Canyon Drainage Diversion now enters Outfall 103 Mulatto Pond associated with NPDES Individual Permit No. NM0029581.
Salt Storage Piles	*(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)* Salt storage not described in SWPPP / None observed during site tour.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* No windblown trash was observed during site tour.
Evidence of non-storm water discharges	None observed
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* Active haul roads are watered during dry periods to minimize dust generation described in SWPPP. Dust control measures described by Permittee representatives during site tour. No substantial windblown dust generation observed during site tour.

Notes on SWPPP Implementation and Sector Specific Requirements
List and describe structural controls *(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)* Most areas and structural controls associated with NPDES Individual Permit No. NM0029581. See notes above for Erosion and Sediment Controls.

Peabody

Lee Ranch Mine
A Division of Peabody Natural
Resources Company
PO BOX 757
35 Miles N. of Milan, NM
Grants, NM 87020
505-285-4651
505-285-4650

November 12, 2019

Sarah Holcomb Program Manager
New Mexico Environment Department SWQB (N2050)
Point Source Regulation Section
PO Box 5469
Santa Fe, NM 87502

Re: Peabody Natural Resource Company - Lee Ranch Mine
MSGP Permit NMR053371
MSGP Compliance Evaluation Inspection September 9, 2019

Dear Ms. Holcomb:

On September 9, 2019 the New Mexico Environment Department (NMED), on behalf of the U.S. Environmental Protection Agency (USEPA), conducted a Compliance Evaluation Inspection of the Peabody Natural Resources Company (PNRC) Lee Ranch Mine Multi Sector General Permit (MSGP) NMR053371. PNRC received the MSGP Compliance Evaluation Inspection Report on October 15, 2019. Please find below PNRC's response to the findings of the inspection.

The electronic copy of SWPPP was not signed/certified

The LRM SWPPP was last revised in January 2017 and the signature page of the electronic copy was inadvertently left blank. This has been resolved and a copy of the current Section 7 SWPPP Certification page has been enclosed with this submittal letter. Note that PNRC has updated the LRM SWPPP in response to the findings of this inspection and the provided certification page aligns with these changes. Additional information about these revisions are included in the responses below.

The SWPPP does not include an updated Non-Stormwater Discharge Assessment. SWPPP includes information on evaluations conducted 12/12/2008 and 12/10/2009 and that non-stormwater discharges at facility have not changed since last inspection.

Nearly all of the activities at the LRM are covered by NPDES Permit No. NM0029581, with MSGP Permit NMR053371 only applying to a few discrete areas located outside of the drainage areas that report to sediment structures permitted as outfalls under NM0029581. These areas include 3.87 acres along the outslope of the rail loop, 1.56 acres below the enclosed overhead coal conveyor belt, and 21.39 acres along the mines haul roads near low water crossings. The primary industrial activity that occurs along the rail loop and coal conveyor beltline is the shipment of crushed coal. The coal is conveyed on a 48-inch wide belt that is enclosed by a metal housing to minimize dust generation and moisture additions from precipitation as well as prevent damage to the belt from ultraviolet rays. Any spills of coal are cleaned up using hand tools or if

needed, small mobile equipment (i.e., backhoe). Repairs of the conveyor may involve use of heavy equipment for a limited period of time (several days), but these activities are done at either the head or tail of the crossing belt section that are located upstream of a NM0029581 outfall. Industrial activity associated with the haul roads are limited to transport of pit-run coal from the mine pits to the coal processing facilities, and occasionally transport of spare parts, fuel, and explosives from storage areas to the mine pits. No storage of rolling stock spare parts, fuel, lubricants, coolants, cleaners, explosives, or other materials occurs within these areas. Mine spoil and refuse piles are limited to areas above NM0029581 permitted outfalls and are not located within areas covered by the 2015 MSGP. During the last several years, there have been no significant materials that have been handled, treated, stored, or disposed of within the SWPPP areas that have been exposed to stormwater.

Section 5.2.3.4 of the 2015 MSGP states that the presence of unauthorized non-stormwater discharges must be evaluated and documented within the sites SWPPP and that the documentation must include the date of the evaluation, a description of the evaluation criteria, the list of drainage points observed, and any actions taken to eliminate unauthorized discharges such as obtaining a separate NPDES permit to cover these areas. The non-stormwater discharge assessments for the five areas that drain to the MSGP stormwater outfalls were completed in 2008 and 2009 and are documented in the SWPPP. There have been no changes in the site activities that would result in non-stormwater discharges from these areas since the assessments were completed and PNRC believes that this condition has been properly satisfied.

The Notice of Intent (NOI) submission deadline in Table 1-2 of the 2015 MSGP for operators of industrial activities that were authorized for coverage under the 2008 Multi-Sector General Permit (MSGP) was "No later than September 2, 2015." EPA electronic databases indicate that the operators NOI was submitted February 29, 2016.

When the 2015 MSGP became effective the LRM was authorized by permit No. NMR053149. In 2016 a second NOI was mistakenly submitted for the LRM. This resulted in the authorization of Permit No. NMR053371, which became effective on 3/30/2016. Upon realizing this discrepancy LRM contacted EPA NeT Support for guidance on how to address this issue. The resolution was to terminate permit NMR053149 and continue coverage under permit NMR053371.

The provided Stormwater Pollution Prevention Plan (SWPPP) includes discussion on dust controls and that dust control is also regulated by air quality and mining permit. The SWPPP did not include specific air quality permit requirements and how achieved compliance. Part 8.H.6.4 of the 2015 MSGP states "If you are in compliance with dust control requirements under state or county air quality permits, you, must include (or summarize, as necessary) what the state or county air quality permit dust control requirements are and how you achieved compliance with them.

Section 3.12 of the LRM SWPPP has been updated with the NSR Air Quality Permit No. 416-M-2 and MMD Permit No. NM19-2P dust control requirements. These include:

<u>NSR Air Quality Permit No. 416-M-2</u>

- Installation and proper operation of water sprays, dust collection and control systems (i.e. cyclone, scrubber, baghouse), or other equally effective control measures at screens, conveyor belts, conveyor transfer points, and stock piles.

- Truck traffic areas and haul roads going in and out of the plant site must be watered, treated with surface stabilizing agent, or paved with an appropriate surface as necessary.

MMD Permit No. NM19-2P

- Total Suspended Particulate (TSP) must be monitored at the three LRM Air Quality Monitoring stations for one 24-hour sampling period each month. Measured TSP must meet the New Mexico 24-hour maximum TSP standard (150 $\mu g/m^3$) and annual average TSP (60 $\mu g/m^3$) standards.

LRM achieves compliance with these requirements by utilizing water trucks to dampen active haul roads, ready lines and other high traffic areas. Water sprays are used to control dust at the coal crusher and the overhead coal conveyor belt is structurally enclosed in order to minimize dust generation. Crushed coal is also stored in enclosed silos. LRM monitors Total Suspended Particulate at its three air quality stations and compares the measurements to New Mexico's TSP air standards. The data is reported to MMD per the requirement of NM19-2P. A copy of the updated Section 3.12 has been enclosed.

No Quarterly Visual Assessment samples or benchmark monitoring samples were collected for rain events outside staff normal business hours

The LRM is currently in a care and maintenance state with minimal staff and equipment onsite while the mine is not actively extracting coal. LRM is located in a semiarid region of New Mexico that is characterized by its limited precipitation, high evapotranspiration rates, and significant moisture deficits. From 2015 through 2018 the mean annual precipitation measured at the LMR weather station was 9.1 in (range: 5.47 – 13.82 in). The stormwater outfalls are checked after precipitation events when possible to try and obtain visual assessment / benchmark samples, but sufficient volumes of runoff are rarely available. The sandy soils, which allow for rapid infiltration, and small drainage areas reporting to the stormwater outfalls limits the volume and duration of runoff that is generated. Flow events in the ephemeral arroyos (Mulatto Canyon, Arroyo Tinaja, and San Isidro Arroyo) near the LRM also occurs irregularly, with flow events that produce sufficient volumes of runoff for sample collection occurring on average 4 times per year (range: 1 – 10 times per year) despite the significantly larger drainage areas reporting to them. Runoff events that produce suitable volumes for sample collection are typically the result of isolated thunderstorms. These flow events are flashy and are characterized by rapid peaks and short flow durations and often present significant safety hazards for accessing sample locations during the event.

To address these challenges, PNRC will install a single stage, non-automated, passive sampler at representative stormwater Outfall 003a to increase the potential for successful stormwater sample collection outside of normal business hours. The passive sampler is modeled after similar non-automated devices developed by the USGS to monitor isolated ephemeral streams in New Mexico.

In accordance with the LRM's approved reclamation plan, the Mulatto Canyon drainage diversion was completed this year and the channel now reports to Outfall 103 of NPDES Permit NM002958. Stormwater outfalls 001, 002, 004, and 005 report to Mulatto Canyon upstream of this location and their drainage areas are now covered by the individual permit. PNRC intends to pursue the removal of these four outfalls from permit NMR053371 and will not be installing passive samplers at these locations.

Provided SWPPP did not include procedures for required methods, containers, preservation, and holding times. Part 6.2.1.1 of the 2015 MSGP states, "samples must be analyzed consistent with 40 CFR Part 136 analytical methods..." Table II Required Containers, Preservation Techniques, and Holding Times in 40 CFR 136.3 require among other things, preservation using HNO3 to pH<2, or at least 24 hours prior to analysis for Aluminum and Iron; and TSS requires cooling preservation (Cool, ≤ 6 °C).

Although Section 4.5 of the LRM SWPPP previously noted that sample handling, preservation, and transport will follow standard method guidelines, PNRC has updated it with the required containers, preservation techniques, and holding times for the Benchmark and Quarterly Monitoring. A copy of the updated Section 4.5 has been enclosed.

EPA's database indicates 2018 Annual Report was not submitted through NeT (Due January 30 of each year).

The 2018 Annual Report was submitted through NeT on 1/15/2019. A copy of the automated email from NeT acknowledging the certification of the 2018 report along with a copy of the 2018 Annual Report with the certification time stamp is enclosed with this response.

We appreciate the opportunity to respond to these findings. If you have any questions or require additional information, please do not hesitate to contact me at (505) 285-3076.

Sincerely,

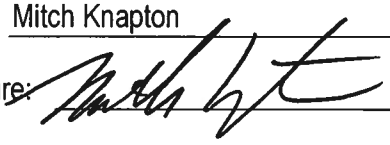
Chad Gaines
Environmental Specialist

cc: NMED Point Source Regulation Program Manager

SECTION 7: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Mitch Knapton Title: General Manager

Signature:  Date: 11-12-19

Lee Ranch Coal Company
A Division of Peabody Natural Resources Company
P. O. Box 757
Grants, New Mexico 87020
Phone: 505-285-4651 Fax: 505-285-4650

I, Mitch Knapton, Operations Manager of Lee Ranch Coal Company hereby authorize Chad Gaines, Engineering Specialist of Lee Ranch Coal Company to be the designated signee for the Stormwater Pollution Prevention Plan and other related documents and submittals to the regulatory authority associated with the US Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industry.

Signed,

Mitch Knapton, Operations Manager, Lee Ranch Coal Company

Date: 11-12-19

Chad Gaines, Environmental Specialist, Lee Ranch Coal Company

Date: 11.12.19

Lee Ranch Coal Company
A Division of Peabody Natural Resources Company
P. O. Box 757
Grants, New Mexico 87020
Phone: 505-285-4651 Fax: 505-285-4650

I, Mitch Knapton, Operations Manager of Lee Ranch Coal Company hereby authorize Seth Puls, Engineering Environmental Manager of Lee Ranch Coal Company to be the designated signee for the Stormwater Pollution Prevention Plan and other related documents and submittals to the regulatory authority associated with the US Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industry.

Signed,

Mitch Knapton, Operations Manager, Lee Ranch Coal Company

Date: 11-12-19

Seth Puls, Environmental Systems Manager, Lee Ranch Coal Company

Date: 11-12-19

Operator or Permittee Response

emptied as needed and taken to the on-site permitted landfill.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

LRM uses a water truck on a daily basis if practicable during dry periods to dampen active haul roads, ready lines and other high traffic areas. The overhead coal conveyor belt is structurally enclosed in order to minimize dust generation. Off-site tracking of raw, final, or waste materials is minimized within the SWPPP areas by not storing potential pollutants within the areas, identifying coal spills along and beneath the overhead coal conveyor beltline and cleaning these up immediately, and complying with the procedures for proper and rapid cleanup of spills in accordance with the SPCC plan.

Dust control is also regulated under LRM's NSR Air Quality Permit No. 416-M-2 and MMD surface mine permit NM19-2P Chapter II, Section 904 Air Pollution Control Plan.

Dust control requirements under NSR Air Quality Permit No. 416-M-2 Include:

- Installation and proper operation of water sprays, dust collection and control systems (i.e. cyclone, scrubber, baghouse), or other equally effective control measures at screens, conveyor belts, conveyor transfer points, and stock piles.

- Truck traffic areas and haul roads going in and out of the plant site must be watered, treated with surface stabilizing agent, or paved with an appropriate surface as necessary.

Dust control requirements under MMD Permit No. NM19-2P:

- Total Suspended Particulate (TSP) must be monitored at the three LRM Air Quality Monitoring stations for one 24-hour sampling period each month. Measured TSP must meet the New Mexico 24-hour maximum TSP standard (150 $\mu g/m^3$) and annual average TSP (60 $\mu g/m^3$) standards.

LRM achieves compliance with these requirements by utilizing water trucks to dampen active haul roads, ready lines and other high traffic areas. Water sprays are used to control dust at the coal crusher and the overhead coal conveyor belt is structurally enclosed in order to minimize dust generation. Crushed coal is also stored in enclosed silos. LRM monitors Total Suspended Particulate at its three air quality stations and compared to New Mexico's TSP air standards. The data is provided to MMD per the reporting requirement of NM19-2P.

There are no pollutant parameters subject to numeric limits for Sector H.

5. **Procedures**. Describe procedures you will follow for collecting samples, including responsible staff who will be involved, logistics for taking and handling samples, laboratory to be used, etc.

Samples will be collected at the SWPPP outfall using the grab sample method in accordance with the sampling schedule described above. Sample handling, preservation and transport procedures using standard methods guidelines will be followed. LRM personnel will collect samples during the first thirty (30) minutes of discharge, and no later than the first hour of discharge. If it is impractical to collect the sample within the first thirty (30) minutes, LRM personnel will document the reason. Storm water discharges resulting from a measurable storm event and that occur at least 72 hours from the previous measurable storm event will be considered sampleable for each category of monitoring. When a sample is collected for benchmark sampling purposes, a grab sample will also be taken for performing a visual inspection of the stormwater runoff. Analyses will be performed in accordance with Standard Methods for Examination of Water and Wastewater published by the American Public Health Association or any applicable test procedure identified within 40CFR 136. Discharge Monitoring Reports with sampling results will be submitted for quarters in which samples were taken.

Benchmark Monitoring
Analytes: Total Aluminum, Total Iron, Total Suspended Solids (TSS), Hardness
Analytic Methods: EPA 200.7 (total aluminum and total iron), SM2540 (TSS), 2340C (Hardness) or any other EPA, Standard Method, ASTM, or USGS analytical test procedure approved for these parameters within 40CFR 136.
Bottles: 1-1000 ml plastic* bottle, no preservative, Cool to ≤ 6 °C
1-500 ml plastic* bottle, with HNO_3 to pH < 2
*Polyethylene or fluoropolymer,
Holding Time: TSS - 7 days
total aluminum, total iron, hardness - 6 months

Quarterly Monitoring
Analytes: Total Aluminum, Total Iron, Total Suspended Solids (TSS)
Analytic Methods: EPA 200.7 (total aluminum and total iron), SM2540 (TSS), or any other EPA, Standard Method, ASTM, or USGS analytical test procedure approved for these parameters within 40CFR 136.
Bottles: 1-1000 ml plastic* bottle, no preservative, Cool to ≤ 6 °C
1-500 ml plastic* bottle, with HNO_3 to pH < 2
*Polyethylene or fluoropolymer,
Holding Time: TSS - 7 days
total aluminum, total iron, hardness - 6 months
Shipping: Ship samples overnight via UPS. Package samples with ice in shipping cooler per requirements of contracted lab. Place copy of COC in cooler. Tape lab shipping address to cooler. Take cooler for shipment to the warehouse or deliver to Milan UPS.

Inactive and Unstaffed sites exception (if applicable)
If you are invoking the exception for inactive and unstaffed sites for benchmark monitoring, include information to support this claim.

EPA Multi-Sector General Permit (MSGP) Forms Certified

Tuesday, January 15, 2019
7:49 AM

Subject	**EPA Multi-Sector General Permit (MSGP) Forms Certified**
From	donotreply@epa.gov
To	donotreply@epa.gov
Sent	Tuesday, January 15, 2019 7:43 AM
Attachments	<<cors.zip>>

2019-01-15
Dear NeT User,
Plesant Gaines successfully certified the following forms under the MSGP General Permit NMR050000:

NPDES ID	Form Type	Operator	Facility Name	Year	Review Date Target End
NMR053371	Annual Report	El Segundo Coal Company	LEE RANCH COAL MINE	2018	n/a

The submission is contained in the attached zip file.
If you have questions about this email or about NeT MSGP, please refer to the NeT Help Center at https://epanet.zendesk.com/hc/en-us/categories/202566467 or e-mail NPDESereporting@epa.gov for assistance.
This is an automated notification; please do not reply to this email.

NPDES FORM 6100-28

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460
ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT

FORM Approved OMB No. 2040-0004

Permit Information

Report Year: 2018

NPDES ID: NMR053371

Facility Information

Facility Name: LEE RANCH COAL MINE

Facility Point of Contact

First Name **Middle Initial** **Last Name:** Plesant C Gaines

Organization:

Title:

Phone: 505-285-3076 **Ext.**

Email: cgaines@peabodyenergy.com

Facility Mailing Address

Address Line 1: PO BOX 757

Address Line 2: 35 MILES NORTH OF MILAN, NM

City: GRANTS

ZIP/Postal Code: 87020

State: NM

County or Similar Division: MCKINLEY

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Routine inspections of storm water outfalls are conducted on a quarterly basis or more frequently if warranted . During 2018, 11 inspectio ns were conducted at each outfall. Erosion control measures such as vegetation, rock check dams, wattles, and straw bales are used as B est Management Practices for control. Routine inspections identify routine maintenance at each location. In 2018, maintenance of the outf alls included regarding, reestablishing, and stabilizing with BMP's or backfill material.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

In 2018 during rainfall events no flow was observed, assessed, or collected at an outfall. The limited spatial extent of the storm water out fall drainage areas and the sandy soils in this area allow for infiltration and limit actual storm water runoff. High intensity precipitation eve nts of sufficient duration have the potential to generate runoff but only for a limited time during and immediately following the event. Outf alls have been inspected during or were timed immediately following an precipitation event in most cases, and there was no discharge of s ufficient volume to collect a visual sample.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

No flow samples were collected in 2018 from SWPPP sites because flow was not sufficient for an analytical sample. Lee ranch experienced an unusually dry year. As a substitute, we have included our surface water monitor data from one site.

Downstream Sample
Total Aluminium: 89 mg/l (benchmark 0.75 mg/l)
Total Iron: 108 mg/l (benchmark 1.0 mg/l)
Total Suspended Solids: 300 mg/l (benchmark 100 mg/l)
In general, these ephemeral streams would be expected to entrain more streambed material into the suspended load moving downstream as the watershed area and flow volumes increase. The magnitude of
concentrations shown above is typical of the intense precipitation events, highly erosive environment, and flash flood flow of these epheme ral streams. The iron and aluminum concentrations are dominated by the
total fraction that is associated with iron and aluminum contained in the sediments. The concentration of total suspended sediments gives an idea of the magnitude of the sediment load during these flood events.
Areas associated with the stormwater permit onsite are expected to have lower concentrations than these natural conditions, because BM Ps are in place to reduce sediment entrainment and flow velocities beyond
what natural conditions in the area provide. This type of analysis will be used for comparison with MSGP stormwater samples when there i s sufficient discharge to collect samples from stormwater outfalls.
Because these types of erosive flash flood flows are typical of the region, no corrective action was determined to be necessary above and beyond the typical maintenance activities that are conducted. The erosion
control measures that are currently in place are a significant improvement over the natural conditions in the surrounding area. No addition al control measures are necessary at this time.

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

No corrective action was taken only routine maintenance in 2018 was conducted at a few outfalls such as regarding or reestablishing BMP' s.

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Plesant C. Gaines (CGAINES@PEABODYENERGY.COM)
Certified On: 01/15/2019 9:42 AM